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27           **UNITED STATES DISTRICT COURT  
28       NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

29  
30       CHASOM BROWN, WILLIAM BYATT,  
31       JEREMY DAVIS, CHRISTOPHER  
32       CASTILLO, and MONIQUE TRUJILLO  
33       individually and on behalf of all similarly  
34       situated,

35       Plaintiffs,

36       v.

37       GOOGLE LLC,

38       Defendant.

39           Case No. 4:20-cv-03664-YGR-SVK

40           **JOINT STIPULATION AND [PROPOSED]  
41       ORDER CONTINUING DEADLINES FOR  
42       GOOGLE'S PRESERVATION MOTION**

43           Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between  
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on October 27, 2022 Google filed a motion seeking relief from the Court’s  
4 preservation order (Dkt. 782, “Preservation Motion”);

5 WHEREAS, Plaintiffs’ response to Google’s Preservation Motion is currently due on  
6 November 10, 2022;

7 WHEREAS, Google’s reply in support of its Preservation Motion is currently due on  
8 November 17, 2022;

9 WHEREAS, in the related case *Calhoun v. Google, LLC*, No. 4:20-cv-05146-YGR (N.D.  
10 Cal.) (“*Calhoun*”), Google filed a motion seeking similar relief from the Court’s preservation order  
11 in that case;

12 WHEREAS, in the related case *Calhoun*, the *Calhoun* plaintiffs and Google reached an  
13 agreement to modify the briefing schedule for the motion in that case;

14 WHEREAS, in the related case *Calhoun*, the Court adopted the *Calhoun* parties’ agreement  
15 to modify the briefing schedule for the motion in that case, and set the motion hearing for January  
16 10, 2023;

17 WHEREAS, the Parties here have reached agreement on a similar briefing schedule;

18 NOW THEREFORE, the Parties stipulate to the following revised schedule regarding  
19 certain discovery and class certification deadlines.

- 20 1. The deadline for Plaintiffs’ Opposition to Google’s Preservation Motion is extended  
21 from November 10, 2022 to December 1, 2022.
- 22 2. The deadline for Google’s Reply in support of the Preservation Motion is extended from  
23 November 17, 2022 to December 15, 2022.
- 24 3. The hearing for Google’s Preservation Motion is continued to January 10, 2023.

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1 DATED: November 9, 2022

2 QUINN EMANUEL URQUHART &  
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4 /s/ Andrew H. Schapiro

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## **ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this Joint Discovery Statement. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: November 9, 2022

By *John A. Yanchunis*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

## Plaintiffs,

V.

GOOGLE LLC,

**Defendant.**

Case No. 5:20-cv-03664-YGR-SVK

## [PROPOSED] ORDER

Judge: Honorable Susan van Keulen

Pursuant to stipulation of the Parties, the Court revises the case schedule as follows:

| <b>Scheduled Event</b>                                 | <b>Current Date</b> | <b>New Date</b>   |
|--|---------------------|-------------------|
| Plaintiffs' Opposition to Google's Preservation Motion | November 10, 2022   | December 1, 2022  |
| Google's Reply in Support of its Preservation Motion   | November 17, 2022   | December 15, 2022 |
| Hearing on Google's Preservation Motion                | December 13, 2022   | January 10, 2023  |

## **IT IS SO ORDERED.**

DATED: , 2022

Hon. Susan van Keulen  
United States Magistrate Judge